

PATENT
App. Ser. No.: 10/600,382
Atty. Dkt. No. ROC920030127US1
PS Ref. No.: IBMK30127

REMARKS

This is intended as a full and complete response to the Office Action dated March 9, 2006, having a shortened statutory period for response set to expire on June 9, 2006. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-27 are pending in the application. Claims 1 and 3-27 remain pending following entry of this response. Claims 1, 5, 10, 14-15 and 20 have been amended. Claim 2 has been canceled. Applicants submit that the amendments do not introduce new matter.

Interview Summary

On June 7, 2005, a telephonic interview was held between Randol Read and Christopher T. Shannon, attorneys of record, the Examiner and the Supervisory Examiner. The parties discussed the cited reference *Vogel et al.* Proposed amendments to claims 1, 10 and 15 were discussed. The proposed amendments are reflected in this response.

Claim Objections

Claim 9 is objected to by the Examiner. In the Office Action the Examiner states that "the recitation of 'database table' in line 5 makes the examiner unsure if the it is equivalent to 'index table' or it carries different functionality that has not been realized." Applicants submit that a database table is not equivalent to index. As stated in the claim, "the second data object is contained in a database table." A database table is one of a number of locations where a data object which is to be annotated may be located. As described in paragraph [0035] of the specification, "the data object may be any type data object, such as a text document, a spreadsheet, a database file, a database table, a multimedia file, or any subcomponent thereof, and may be identified by a set of identifying (ID) parameters." Therefore, Applicants believe that claim 9 is clear as written and respectfully request that the objection be withdrawn.

PATENT

App. Ser. No.: 10/600,382
Atty. Dkt. No. ROC920030127US1
PS Ref. No.: IBMK30127

Claims 14, 21 and 22 are objected to by the Examiner. The Examiner states in the Office Action that the "Examiner does not see why database and text document are being referenced. There is no functionality to both recitations in light of the remaining language." Applicants respectfully disagree. Claims 14, 21 and 22 add limitations to the independent claims on which they depend. Specifically, claims 14, 21 and 22 identify locations where annotated data objects may reside. Therefore, Applicants believe that claim 14, 21 and 22 is clear as written and respectfully request that the objection be withdrawn.

Claim 20 has been objected to by the Examiner. Applicants have amended claim 20 to address the concern raised by the Examiner. Accordingly, Applicants respectfully request that the objection be withdrawn.

Claim Rejections - 35 U.S.C. § 112

Claim 8 is rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Examiner states in the Office Action that the Examiner "does not see how first object can be sub-object of second object while parameters of second object are included in parameters of the first object." (Office Action, page 4, Lines: 8-10).

Applicants believe claim 8 is not indefinite as drafted, and do not believe a rejection under 35 U.S.C. 112 is warranted. A first object can be a sub-object of a second object and a second set of identifying parameters can be a subset of a first set of identifying parameters. For example, as described in paragraph [0035] of the application, a first object may be a database column and a second object may be a database table. Database tables commonly have columns; therefore, a first object may be a sub-object of a second object.

Furthermore, a second set of identifying parameters can be a subset of a first set of identifying parameters. For example, the second set of identifying parameters may

PATENT

App. Ser. No.: 10/600,382
Atty. Dkt. No. ROC920030127US1
PS Ref. No.: IBMK30127

identify a database column, and a database column may be identified by a database name, a database table name and a database table column name. The first set of identifying parameters may identify a database table with only a database name and a database table name (i.e., a column name is not required). Thus, the first set of identifying parameters (i.e., a database name and a database table name) may be a subset of a second set of identifying parameters (i.e., a database name, a database table name and a database table column name). Therefore, Applicants believe claim 8 is correct as drafted. Accordingly, Applicants respectfully request that the rejection be withdrawn.

Claim Rejections - 35 U.S.C. § 101

Claims 1, 10, 15, and 20 are rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicants submit these claims, as amended, are directed to statutory subject matter. Accordingly, Applicants respectfully request that the rejection be withdrawn.

Claim Rejections - 35 U.S.C. § 102

Claims 1-4, 10, and 15-16 are rejected under 35 U.S.C. 102(e) as being anticipated by *Vogel* (US Patent 6,665,581).

Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

PATENT

App. Ser. No.: 10/600,382
Atty. Dkt. No. ROC920030127US1
PS Ref. No.: IBMK30127

In this case, *Vogel* does not disclose "each and every element as set forth in the claim." For example, *Vogel* does not disclose the claim 1, claim 10 and claim 15 limitation of "creating an annotation corresponding to a first data object identified by a first plurality of identifying parameters that identify a location of the first data object."

Vogel describes a "System and method for Generating a Taxonomy from a plurality of Documents." (*Vogel*, Title). *Vogel* describes a text processing system which generates a taxonomy "based on clusters of phrases and a topical library."

Nowhere in *Vogel* is there any teaching of an annotation or identifying parameters that identify a location of an annotation of the first data object, as recited in the claims. Therefore, claim 1, claim 10 and claim 15 and their dependents are allowable, and allowance of the claims is respectfully requested.

Claims 20-27 are rejected under 35 U.S.C. 102(e) as being anticipated by *Bays et al.* (US Patent 6,519,603 B1).

Applicants respectfully traverse this rejection.

In this case, *Bays* does not disclose "each and every element as set forth in the claim." For example, *Bays* does not disclose the claim 20 limitation of "a plurality of mappings, each containing functions for mapping a set of identifying parameters for a different type of data object to one or more columns in the index table."

Bays is directed to a method and apparatus for capturing annotations. (*Bays*, Abstract). The main purpose of *Bays* is to create annotations of different structure types. (*Bays*, Abstract). For example, Figure 2 of *Bays* illustrates several annotations of different structure types which may be created. (*Bays*, Figure 2). As illustrated in Figure 2, each different annotation structure type may have different fields for entering annotation data. (*Bays*, Figure 2)

The Examiner argues that *Bays* discloses "mappings" at column 2, lines 61-63. However, the cited section simply discusses different attributes an annotation structure

PATENT

App. Ser. No.: 10/600,382
Atty. Dkt. No. ROC920030127US1
PS Ref. No.: IBMK30127

may contain. (*Bays*, Column: 2, Lines: 61-63). Nothing is mentioned in the cited section, nor anywhere else in *Bays* regarding "mappings...containing functions for mapping a set of identifying parameters for a different type of data objects to one or more columns in the index table."

Therefore, claim 20 and its dependents are allowable, and allowance of the claims is respectfully requested.

PATENT
App. Ser. No.: 10/600,382
Atty. Dkt. No. ROC920030127US1
PS Ref. No.: IBMK30127

Conclusion

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, Applicants believe that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



Randol W. Read
Registration No. 43,876
PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd. Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicants